



Lincoln County Television
29 Sheepscot Rd, Newcastle, ME 04553
207-563-6338
lctv1@lctv.org
www.lctv.org

July 25, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Lincoln County Television submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Lincoln County Television is a public, education and government access station. Our community produces @ 4400 hours video every year. Our programming is available to @ 5000 subscribers in ten towns in Lincoln County, Maine.

We carry several shows - Democracy Now!, The Thom Hartmann Show, Creating Cooperative Kids – The Parenting Show, and Earth Focus - which have closed captioning. Unfortunately, our multichannel video programming distributor (MVPD), Time Warner Cable, does not list our shows on their onscreen video programming guide, so none of our viewers (many of whom are hard of hearing – Lincoln County has the oldest population in the country), are not informed that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Time Warner Cable uses the generic “Local Programming” to describe all our shows. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). We have asked Time Warner Cable to list our programming the same as they list other stations' programming, but are told, “We are not capable of doing that at the present time.” Viewers cannot determine from the MVPD’s video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,

Mary Ellen Crowley

Executive Director

LCTV